

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ASHINA HICKS,)	
)	
Plaintiff,)	Case No. 07 C 6676
)	
v.)	Judge Darrah
)	
P.O. JAMES TYSZKO #70 and P.O.)	Magistrate Judge Cox
MIKOS #61, individually)	
)	Jury Demand
Defendants.)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE THEIR
FIRST AMENDED COMPLAINT AT LAW**

NOW COMES the Plaintiff, ASHINA HICKS, by and through her attorneys, Gregory E. Kulis and Associates, and asks this Honorable Court for leave to file Plaintiff's First Amended Complaint at Law pursuant to Fed. R. Civ. Proc. 15(a). In support of her request, Plaintiff states as follows:

1. On November 28, 2007, Plaintiff filed her Complaint at Law against Defendants, with Plaintiff asserting one count of excessive force and one count of false arrest in violation of Plaintiffs' rights protected by 42 U.S.C. §§ 1983 and 1988, and one state law claim of malicious prosecution.

2. As a result of further information coming to light during records produced during the discovery process, it is necessary that the allegations in Plaintiff's complaint be revised.

3. Accordingly, the Plaintiff seeks leave to file her proposed First Amended Complaint (a proposed copy of which is attached as Exhibit A).

4. Plaintiffs' proposed First Amended Complaint:

a. Revises paragraph no. 10 of Count 1.

WHEREFORE, Plaintiff ASHINA HICKS respectfully requests this Honorable Court to enter an order granting her leave to leave to file Plaintiff's First Amended Complaint at Law pursuant to Fed. R. Civ. Proc. 15(a), and for such other relief the Court deems appropriate.

Respectfully submitted,
ASHINA HICKS

BY: /s/ Ronak Patel
Gregory E. Kulis & Associates

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